



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

March 8, 2017

Certified Mail: 70132630000037149224

Mr. James Tipton
Ohio Stave Company
P.O. Box 207
1519 Sharon Ave.
Zanesville, OH 43702-0207

**Re: Ohio Stave Company
Resolution of Violation (ROV)
Air Permit
Muskingum County
0660010029**

Division of Air Pollution Control

Subject: Resolution of Violation

Dear Mr. Tipton:

Thank you for your August 2, 2016 and December 22, 2016 responses to Ohio EPA's June 23, 2016 Notice of Violation (NOV) letter and June 23, 2016 Partial Resolution of Violation. Your response included a plan to return the facility to compliance with the required visible emission inspection records and best available control measures.

Ohio EPA has reviewed the documentation that you provided and has determined that Ohio Stave Company has now resolved the violations associated with the failure to perform daily VE checks and required recordkeeping, and failure to apply best available control measures discovered during the June 17, 2015 and April 25, 2016 inspections. To ensure that the violations have been addressed, Ohio EPA has included Ohio Stave Company's response to the violation and its status below.

Resolution of Violation

Letter Citation: Finding 1 - Failure to perform daily VE checks of egress points for EU F001

Rule Citation: Permit terms and conditions C.1.d)(1) for emissions unit F001 (Permit-to-install and operate (PTIO) P0116554 issued on August 18, 2014).

The facility failed to perform daily VE checks of egress points.

The documentation that was submitted by the facility on August 2, 2016, included a plan to return the facility to compliance. Additionally, an inspection of the facility records on June 26, 2016, showed the facility was in compliance with the applicable recordkeeping requirements. The facility has set up a plan that all records will be reviewed by the office

manager to ensure the recordkeeping is complete. Therefore, based on the submitted plan, this violation is considered resolved.

Letter Citation: Finding 2- Failure to report deviations on the annual permit evaluation report for EU F001

Rule Citation: Permit terms and conditions C.1.e)(2) for emissions unit F001 (Permit-to-install and operate (PTIO) P0116554 issued on August 18, 2014).

The facility failed to report deviations in the annual permit evaluation report.

The documentation that was submitted by the facility on August 2, 2016, included a plan to return the facility to compliance. Additionally, an inspection of the facility records on June 26, 2016, showed the facility was in compliance with the applicable reporting requirements. The facility has committed to reporting the recordkeeping deviations in the next due annual permit evaluation report. Therefore, based on the submitted plan, this violation is considered resolved.

Letter Citation: Finding 3- Failure to apply best available control measures and failure to meet the fugitive emissions limits for EU F001

Rule Citation: Permit terms and conditions C.1.b)(1)a., C.2.b)(2)b. and C.2.b)(1)c. for emissions unit F001 (Permit-to-install and operate (PTIO) P0116554 issued on August 18, 2014).

The facility failed to apply best available control measures and to meet the fugitive emissions limits.

The documentation that was submitted by the facility on August 2, 2016, included a plan to return the facility to compliance. Additionally, during a site visit on June 26, 2016, you discussed that the facility has approval to install a cyclone system for the fine sawdust pile to keep the dust from lifting into the air; this project has now been completed. You also indicated that the logs are being watered before debarking as another control measure of fugitive dust. Therefore, based on the submitted plan and installation of the cyclone system, this violation is considered resolved.

Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to ORC Section 3704.06 for the violation noted in the June 23, 2016 NOV and Partial Resolution of Violation letters. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

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Should you have any questions, please contact me at 740-380-5259 or by email at Mykal.riffle@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Mykal L. Riffle". The signature is written in a cursive, flowing style.

Mykal L. Riffle
Ohio EPA – Division of Air Pollution Control
Southeast District Office

MLR/cs

ec: Jessica Kuenzli, DAPC/SEDO
Jim Kavalec/ John Paulian, DAPC/CO
Brian Dickens, U.S. EPA